

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Boston Edison Company )  
Cambridge Electric Light Company )  
Commonwealth Electric Company )

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D.T.E. 03-121

**NSTAR ELECTRIC FIRST SET OF INFORMATION REQUESTS  
TO THE ENERGY CONSORTIUM**

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by NSTAR Electric in this proceeding.

1. Each request should be answered in writing on a separate page (paginated) with a recitation of the request, the identification number of the request (for example, NSTAR-TEC-1-1), the docket number of the case, the date of the response, and the preparer of the response or the name of the person responsible for the answer. Please mark each page of an answer with the identification number of the request. In addition, please clearly reference any attachments to a response with the number of the request to which it applies and include page numbers on all attachments.
2. Please do not wait for all responses to be completed before supplying answers, but instead please provide the answers as they are completed.
3. These information requests shall be deemed continuing in nature so as to require further supplementation if TEC or its witness receive or generate additional information within the scope of those requests between the time of the original response and the close of the record in these proceedings.
4. The terms used interchangeably within these information requests relating to "any and all", "documentation", "support", and "justification" mean provide all data, assumptions, and calculations relied on. Provide the source of and basis for all data and assumptions employed. Include all studies, drafts, memos, reports, and planning documents from which such data, estimates and assumptions were used. Provide and explain any and all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phonographic records,

microfilm, microfiche, computer printouts, memoranda, letters, correspondence, handwritten notes, records and reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If the Respondent believes that any of these information requests are ambiguous or need clarification, please contact David Rosenzweig or Stephen August at (617) 951-1400 so that the requests can be clarified prior to the preparation of a written response.
7. If an answer provides a reference to another information response, please provide that response with the answer.
8. If a question refers to an information request of another party, please provide an answer with information that supplements the previous responses.

### **Information Requests**

#### **Information Requests Relating to the Pre-Filed Testimony of Ms. Saunders**

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| NSTAR-TEC-1-1 | Please provide copies of (1) any and all prefiled testimony or reports (including all associated exhibits and attachments) submitted by Ms. Saunders to state and federal regulatory authorities from 1999 to the present; and (2) any and all transcripts of Ms. Saunders' testimony at hearings (adjudicatory or non-adjudicatory) before state and federal regulatory authorities from 1999 to the present. |
| NSTAR-TEC-1-2 | Provide copies of any and all regulatory decisions addressing the issues covered by Ms. Saunders in testimony provided in response to Information Request NSTAR-TEC-1-1. Identify the decision making authority, docket number, year of the decision, and any official citation to the decision.   |
| NSTAR-TEC-1-3 | Please identify all documents relied upon by Ms. Saunders in preparing this testimony. Please provide a copy of each identified document.  |
| NSTAR-TEC-1-4 | Please provide a copy of any and all articles, papers, speeches or other reports prepared in whole or in part by Ms. Saunders addressing, distributed generation, standby rates and/or rate design.  |
| NSTAR-TEC-1-5 | Referring to page 2, lines 6-8, please provide a copy of all studies, reports or analyses performed by Ms. Saunders that   |

support her conclusion that costs incurred relative to electric distribution systems are not predominantly fixed.

- NSTAR-TEC-1-6 Referring to the table on page 4, please provide a copy of all calculations, workpapers, spreadsheets or other documents that show each calculation that resulted in the values set forth in the table. The copy should be provided both in paper form and electronically. The electronic version should be in Excel format and show all inputs, formulas and linked sources.
- NSTAR-TEC-1-7 Referring to page 7, lines 5-7, would Ms. Saunders' statement that "the aggregated load is highly diverse" be affected by the size of the load of a DG customer on a circuit? Please explain.
- NSTAR-TEC-1-8 Referring to page 7, lines 5-9, please provide any studies performed by Ms. Saunders or TEC that identify the degree diversity of load at the distribution circuit level exists for Boston Edison, Cambridge and/or Commonwealth.
- NSTAR-TEC-1-9 Referring to page 8, lines 8-14, please explain in detail whether Ms. Saunders believes there are different distribution facilities involved in meeting a customer's load requirements in relation to: (a) distribution facilities that are subject to a distribution company's line extension policy (and a potential contribution in aid of construction); and (b) other distribution facilities that are needed to meet the customer's load requirements throughout the distribution system.